REMARKS
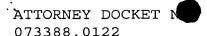
This Application has been carefully reviewed in light of the Office Action dated April 17, 2003. Applicant respectfully requests reconsideration and favorable action in this Application.
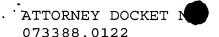
Claims 12-22 stand rejected under 35 U.S.C. §102(e) as being anticipated by Burnett, et al. Independent Claim 12 recites in general a connections property table in a requesting first network used to generate keys to gain access to a server object in a requested second network. By contrast, the Burnett, et al. patent has an authenticator routine associated with a server system that determine whether a client request can be satisfied. Thus, all authentication for a request is performed in the server station as opposed to the requesting client station and there is no connections property table in the requesting client station of the Burnett, et al. patent as provided by the claimed invention. Moreover, the Burnett, et al. patent specifically states that its client station need not know anything about the source of the object being requested and thus teaches away from the claimed invention. See col. 8, lines 1-13 of the Burnett, et al. patent. Further, the Examiner readily admits that the Burnett, et al. patent fails to disclose a connection properties table located in a requesting client network. Therefore, Applicant respectfully submits that Claims 12-22 are not anticipated by the Burnett, et al. patent.

Claims 1-11 and 23-27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Burnett, et al. in view of Quinlan. Applicant respectfully traverses this rejection.

There is no suggestion or motivation in the Burnett, et al. and Quinlan patents to combine them as proposed by the Examiner. The Burnett, et al. patent is directed to a method for providing authenticated access to files at a server system

in response to requests from a client system. The Quinlan patent is directed to the use of session pools to initiate new session connections or establish previously existing session connections without having an authentication requirement. Thus, none of the cited patents are related to any common subject matter. Moreover, the Examiner has not cited any language within either the Burnett, et al. or Quinlan patents that would suggest any capability for them to be combined despite their unrelated subject matter. The portions of the Quinlan patent cited by the Examiner to support combination with the Burnett, et al. patent merely addresses where state information pertaining to a connection session is located in a client network but does not address any aspect of authentication as provided in the Burnett, et al. patent. The Examiner merely uses isolated portions of the cited references to provide a conclusory subjective reasoning in support of their combination without looking at what the references teach as a whole as is required by M.P.E.P. §2141.02. Absent any support from within the patents as a whole to combine them as has been proposed, the Examiner is applying an improper hindsight reconstruction of the claimed invention from the bits and pieces of isolated citations in the references. Further, the Burnett, et al. patent provides for authentication control in a server system while the Quinlan patent addresses removing responsibilities from the server system by placing session connection maintenance in its client system. Thus, the server system burden removal concept of the Quinlan patent is in contrast with the server system authentication control concept of the Burnett, et al. patent. Also, each reference has been placed into separate and distinct classifications in the U.S. Patent and Trademark Office that have no obvious relationship to each other. Therefore, Applicant respectfully submits that the Burnett, et

al. and Quinlan patents have been improperly combined by the Examiner.

Moreover, even if the references were capable of being combined, their resulting structure does not meet the terms of the claims. Independent Claims 1 and 23 recite in general the formation of a boundary traversal key from a connections property table at a client network having information to traverse a boundary device controlling access to a server network and forwarding the boundary traversal key to the boundary device controlling access to the server network. By contrast, the Burnett, et al. patent performs its authentication process at its server system and has no connections property table at its client system while the Quinlan patent merely maintains session connections with no authentication capability or boundaries to traverse. Thus, the Examiner's proposed combination of the server system controlled authentication process of the Burnett, et al. patent with the session connection maintenance technique of the Quinlan patent, which makes no mention of authentication or boundary traversal, would still lack the ability to provide a connections property table at a client network having information to generate a boundary traversal key in order to traverse a boundary device controlling access to a server network as required by the claimed invention. Therefore, Applicant respectfully submits that Claims 1-11 and 23-27 are patentably distinct from the proposed Burnett, et al. - Quinlan combination.

Applicant has now made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of Claims 1-27.

The Commissioner is hereby authorized to charge any amount required or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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July 17, 2003

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